

INTERROGATORIES -- [DEFENDANT SUPPLEMENTED ANSWER]

Interrogatory No. 1. Identify all persons with knowledge of any information McDonnell has used or may use to support defenses of the Commission's claims.

RESPONSE TO INTERROGATORY #1.

Defendant does not speak specifics of information with anyone in regards to supporting defense. Defendant had sought the consultation of the Pro Se Legal Assistance Project, located at 225 Cadman Plaza East Brooklyn, NY 11201, Tel: (212) 382-4729 Attention: Cat Itaya/Director. Defendant since has resigned as of Thursday, May 10, 2018 at 8:21 AM.

Interrogatory No. 2. Identify all documents concerning any information McDonnell has used or may use to support defenses of the Commission's claims.

RESPONSE TO INTERROGATORY #2.

Defendant has addressed a very similar question in his supplemented answer to **PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT**

REQUESTS TO DEFENDANT PATRICK K. MCDONNELL ie: 1. *"All documents and communications that you have used or may use to support your defense of the Commission's claims, including but not limited to materials you used in preparation for or during the March 6, 2018 Hearing, or that you referred to during the April 12, 2018 telephone conference before Chief Magistrate Judge Mann."* Defendant has been cautious in not being redundant in responses to Plaintiff **DOCUMENT** and **INTERROGATORIES REQUESTS** yet Plaintiff styled questioning is somewhat identical by nature.

- **Plaintiff Complaint** [Docket #1] Defendant has not attached because Plaintiff obviously drafted Complaint.
- **Defendant Motion To Dismiss** [Docket(s) #18, #18(1), #18(2), #18(3), #18(4) filed 02/15/18. Defendant has not attached because Plaintiff has been served appropriately.
- **Declaration of Christopher Giglio Pursuant To 28 U.S.C. § 1746 W/Exhibit Binder** Defendant has not attached because Plaintiff obviously drafted Declaration/Exhibits.
- **[EXHIBIT]** REF: Fear, uncertainty and doubt; From Wikipedia, the free encyclopedia
Website Link: https://en.wikipedia.org/wiki/Fear,_uncertainty_and_doubt
- **[EXHIBIT]** REF: Internet troll; From Wikipedia, the free encyclopedia
Website Link: https://en.wikipedia.org/wiki/Internet_troll
- **[EXHIBIT]** ARTICLE "The Guardian"; Ed Sheeran quits twitter after abuse from trolls
Website Link: <https://www.theguardian.com/music/2017/jul/04/ed-sheeran-twitter-abuse-trolls>
- **[EXHIBIT]** ARTICLE "The Merkle"; Beware of the Fake Vitalik Buterin Profile On Twitter
Website Link: <https://themerke.com/beware-of-the-fake-vitalik-buterin-profile-on-twitter/>
- **[EXHIBIT]** ARTICLE "motherboard"; Ethereum Scammers Posing as Tech Celebrities Are Running Rampant On Twitter
Website Link:

https://motherboard.vice.com/en_us/article/7x7dxe/ethereum-scammers-posing-as-tech-celebrities-vitalik-buterin-are-rampant-on-twitter

- [EXHIBIT] ARTICLE "CoinTelegraph"; Multiple 'Charlie Lee' Imposter Twitter Accounts Promise Fake LTC Giveaway **Website Link:**

<https://cointelegraph.com/news/multiple-charlie-lee-imposter-twitter-accounts-promise-fake-ltc-giveaway>

- [EXHIBIT] ARTICLE "Wall Street Journal"; CFTC Reports Steep Drop in Enforcement Actions and Fines **Website Link:**

<https://www.wsj.com/articles/cftc-reports-steep-drop-in-enforcement-actions-and-fines-1511384084>

- [EXHIBIT] ARTICLE "Pensions & Investments"; CFTC Enforcement actions down significantly from previous fiscal year **Website Link:**

<http://www.pionline.com/article/20171127/ONLINE/171129904/cftc-enforcement-actions-down-significantly-from-previous-fiscal-year>

- [EXHIBIT] ARTICLE "Wall Street Journal"; CFTC Steps Up Enforcement Against Fraud, Market Manipulation **Website Link:**

<https://www.wsj.com/articles/cftc-steps-up-enforcement-against-fraud-market-manipulation-1519727401>

- [EXHIBIT] ARTICLE "CNBC"; US Government is nowhere close to regulating bitcoin, White House cybersecurity coordinator says **Website Link:**

<https://www.cnn.com/2018/02/16/munich-security-conference-us-government-nowhere-near-regulating-bitcoin.html>

- [EXHIBIT] ARTICLE "CRYPTOVEST"; CFTC, SEC Chairs Ready to Discuss Virtual Currencies Before Congressional Committee **Website Link:**

<https://cryptovest.com/news/cftc-sec-chairs-ready-to-discuss-virtual-currencies-before-congressional-committee/>

- [EXHIBIT] ARTICLE "U.S. SENATE COMMITTEE ON BANKING, HOUSING, & URBAN AFFAIRS"; Virtual Currencies: The Oversight Role of the U.S. Securities and Exchange Commission and the U.S. Commodity Futures Trading Commission **Website Link:**

<https://www.banking.senate.gov/hearings/virtual-currencies-the-oversight-role-of-the-us-securities-and-exchange-commission-and-the-us-commodity-futures-trading-commission>

- [EXHIBIT] ARTICLE "LAW360"; Digital Currency Co. Says CFTC's Suit Is Political **Website Link:**

<https://www.law360.com/articles/1013762/digital-currency-co-says-cftc-s-suit-is-political>

- [EXHIBIT] ARTICLE "Reuters"; U.S. CFTC sues three virtual currency operators for fraud **Website Link:**

<https://www.reuters.com/article/us-usa-cftc-bitcoin/u-s-cftc-sues-three-virtual-currency-operators-for-fraud-idUSKBN1F81K9>

- [EXHIBIT] ARTICLE/VIDEO "CNBC"; CFTC charges CabbageTech with virtual currency fraud **Website Link:**

<https://www.cnn.com/video/2018/01/19/cftc-charges-cabbagetechn-with-virtual-currency-fraud.html>

- [EXHIBIT] ARTICLE "CCN"; United States CFTC Claims Jurisdiction over Bitcoin

Website Link: <https://www.cnn.com/united-states-cftc-claims-jurisdiction-over-bitcoin/>

[EXHIBIT ATTACHED]; Defendant business twitter account and website descriptions.

Defendant has already mentioned on record that the above physical documents were disposed of after March 06, 2018 hearing and is respectfully submitting live links to sources of requests.

Interrogatory No. 3. Identify all persons with knowledge of customers and potential customers of CDM and/or McDonnell.

RESPONSE TO INTERROGATORY #3.

Defendant was the sole operator and owner of business there were no other persons with knowledge of customers or potential customers as Defendant was steadfast in privacy rights.

Interrogatory No. 4. Identify all documents concerning customers and potential customers of CDM and/or McDonnell.

RESPONSE TO INTERROGATORY #4.

Again, Defendant has addressed a very similar question in his supplemented answer to

PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL ie: 4a. *"All documents and communications relating to clients and potential clients of CDM."*

Defendant possesses no digital/physical documents or communications relating to clients and potential clients of business. Defendant once again mentions he has declared on Court record that the information sought in regards to client list is located within business PayPal account that Plaintiff has been authorized by Defendant signature to obtain via subpoena request. Plaintiff has also been afforded by Defendant authorization/permission access to business email account coindropmarkets@gmail.com and Social Media extensions.

Interrogatory No. 5. Identify all persons with knowledge of CDM solicitation materials developed, used by, or in the possession, custody, or control of CDM and/or McDonnell.

RESPONSE TO INTERROGATORY #5.

Again, Defendant has addressed a very similar question in his supplemented answer to

PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL ie: 4b. *"All documents and communications relating to solicitation materials developed, used by or in the possession of CDM."*

As noted above [#3], Defendant was the sole operator and owner of business there were no other persons contracted or employed or who could possibly possess any such knowledge. Defendant business twitter account and website descriptions **ATTACHED to DOCUMENT REQUESTS** only data available to Defendant currently available online for public review.

Interrogatory No. 6. Identify all documents concerning CDM solicitation materials developed, used by, or in the possession, custody, or control of CDM and/or McDonnell.

RESPONSE TO INTERROGATORY #6.

Again, Defendant has addressed a very similar question in his supplemented answer to **PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL** ie: 4b. *"All documents and communications relating to solicitation materials developed, used by or in the possession of CDM." Like above, Defendant business twitter account and website descriptions ATTACHED to DOCUMENT REQUESTS only data available to Defendant currently available online for public review.*

Interrogatory No. 7. Identify all persons with knowledge of trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating the trading of virtual currency.

RESPONSE TO INTERROGATORY #7.

Again, Defendant has addressed a very similar question in his supplemented answer to **PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL** ie: 4c. *"All documents and communications relating to trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating trading of virtual currency."* Defendant was not in the business of managed investment accounts and was the sole operator and owner of CabbageTech, Corp. there were no other persons contracted or employed or who could possibly possess any such knowledge as trading conducted by or under authority was not a service offered, therefore, no such futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating trading of virtual currency accounts could exist.

Interrogatory No. 8. Identify all documents concerning trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating the trading of virtual currency.

RESPONSE TO INTERROGATORY #8.

Again, Defendant has addressed a very similar question in his supplemented answer to **PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL** ie: 4c. *"All documents and communications relating to trading conducted by or under the authority of McDonnell and/or CDM, including but not limited to accounts opened at futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating trading of virtual currency."* Defendant was not in the business of managed investment accounts, therefore, no such futures commission merchants, virtual currency exchanges, or any other trading firm or service facilitating trading of virtual currency accounts could exist.

Interrogatory No. 9. Identify all persons with knowledge of CDM's and/or McDonnell's trading track record posted on CDM website(s) or in CDM promotional materials.

RESPONSE TO INTERROGATORY #9.

Defendant was the sole operator and owner of CabbageTech, Corp. there were no other persons contracted or employed or who could possibly possess any such knowledge being as Defendant believes it never existed in the first place. Defendant does not recall, nor, does submitted website information disclose any type of trading track record posted on behalf of business. As stated in **DOCUMENT REQUESTS**; *"Defendant believes business would have needed to have operated for a full 12 month fiscal year to create such trading track record."*

Interrogatory No. 10. Identify all documents concerning CDM's and/or McDonnell's trading track record posted on CDM website(s) or in CDM promotional materials.

RESPONSE TO INTERROGATORY #10.

Again, Defendant does not recall, nor, does submitted website information disclose any type of trading track record posted on behalf of business. As stated in **DOCUMENT REQUESTS**; *"Defendant believes business would have needed to have operated for a full 12 month fiscal year to create such trading track record."*

Interrogatory No. 11. Identify all persons with knowledge of accounts under the name of or under the control of McDonnell and/or CDM.

RESPONSE TO INTERROGATORY #11.

Defendant operated CabbageTech, Corp. completely alone there were no other persons directly involved who could possibly possess any such knowledge of non-existing accounts. Defendant possesses no accounts or the knowledge of accounts under the name of or under the control of McDonnell and/or CDM held by any third-party because no such accounts could have existed.

Interrogatory No. 12. Identify all documents concerning accounts under the name of or under the control of McDonnell and/or CDM.

RESPONSE TO INTERROGATORY #12.

Again, Defendant has addressed a very similar question in his supplemented answer to **PLAINTIFF COMMODITY FUTURES TRADING COMMISSION'S FIRST SET OF DOCUMENT REQUESTS TO DEFENDANT PATRICK K. MCDONNELL** ie: 2. *"All documents and communications relating to accounts under the name of or under the control of McDonnell."* Again, Defendant to the best of his knowledge does not maintain or recall any type of account(s) under his name or CDM, nor, does Defendant possess control of any account(s) outside of a possible virtual currency wallet held at Poloniex mentioned in **DOCUMENT REQUESTS**. Defendant does not possess any type of documents/communications as believed there is no such account(s) related to him/CDM. Defendant has discussed with Plaintiff when he did transact in virtual currency it was via a personal Bittrex multi-wallet **[all account communications/documents already in Plaintiff possession]** and/or decentralized wallets which Defendant has provided to Plaintiff in an earlier discovery response.

*Defendant had only **two specific** virtual currency wallets identified by Plaintiff in regards to **CabbageTech, Corp. ["Company"]** transactions [**"1 Bitcoin address and 1 Litecoin address"**] which Defendant has already supplied data requested to the best of his knowledge and recollection.*

Interrogatory No. 13. Identify all virtual currency addresses and transaction IDs relating to McDonnell and/or CDM.

RESPONSE TO INTERROGATORY #13.

As mentioned in **DOCUMENT REQUESTS** Defendant has previously provided Plaintiff with all known business/personal virtual currency addresses and transactions via the public blockchain(s) of said request. Defendant does not possess any virtual currency address or additional transaction IDs to his recollection not already known to Plaintiff.

